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CLERK, U.S. DISTRICT COURT,
WESTERN DISTRICT OF TEXAS
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Kiera Mathis,

United States District Court

31st District Of _____

Dated On 9/14/2021
BEXAR COUNTY

Plaintiff § Case No. 2021cl13518
§ NOTICE TO COURT
§ AMENDED COMPLAINT
v.
THE DEPARTMENT OF §
FAMILY AND PROTECTIVE §
SERVICES, ARLENE HERRERA, §

SA21CA0898 XR

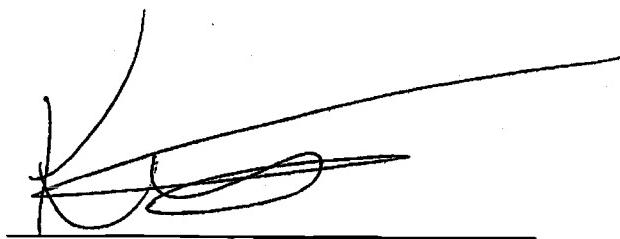
NOTICE OF AMENDED COMPLAINT

Please Take Notice that under Federal Rule of Civil procedure 15 (a)(1) b Amended and Supplemental Pleadings, today, Plaintiff Kiera Mathis, the natural person filed an Amended Complaint. The Amended Complaint adds ARLENE HERRERA, and TDFPS in individual capacity. ARLENE HERRERA is a social worker of TDFPS who Seized 3 of the plaintiff offsprings and her civil rights August 27, 2019 without A warrant or RTB wherein the hearing took place September 16, 2019.

Witnesses Seargent Omar Warthen, Betty Brothers and Witness Alvin Mathis are added to the Complaint. Witness Betty Brothers is the home Owner and the family of minor M.S who witness the seizure of M.S who was in a loving family home. Seargent Omar Warthen took the plaintiff to see her kids many times in 2019, Witnessed how it injured her, the violation of her constitutional rights to Pursuit of Happiness and Parental Rights and Responsibilities Act with No danger present. Alvin Mathis witnessed the Deprivation and misrepresentation.

Article IV, section 2, clause 1, Monell v. Department of Social Services, 436 U.S. 658 (1978), The Universal Declaration of Human Rights Article 7, 8 and 12 and Parental Responsibilities of 1995 Act, **Ram v. Rubin, 118 F.3d 1306 (9th Cir. 1997)** case law is added to the complaint. **Perkins v. City of West Covina, 113 F.3d 1004, 1008 (9th Cir.1997)** adds to Plaintiff Lawsuit 42 USC 1983, Wherein 1993, it was infact clear that a parent had a constitutionally protected right to the care and custody of his children And that he could not be summarily deprived of that custody without notice and a hearing, except when the children were in imminent danger. Supreme case law **Rogers v. County of San Joaquin** is also added to the plaintiff complaint Wherein it clarified That seizing a child without a warrant is excusable only when officials "have reasonable cause to believe that the child is likely to experience serious bodily harm in the time That would be required to obtain a warrant." See the Texas penal code sec 22.041, Fact Finding, affidavit and statement of Claim in Support with the foregoing of case laws.

Respectfully Submitted,



Kiera Mathis

Pro Se

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